# Weatherization Grantee Health and Safety (H&S) Plan- *Optional Template*State of Hawaii Department of Labor and Industrial Relations – Office of Community Services

### 1.0 – General Information

Additional information that does not fit neatly in one of the other sections of this document.

Enter Additional H&S Information Here

### 2.0 — BUDGETING

Grantees are encouraged to budget H&S costs as a separate category and, thereby, exclude such costs from the Average Cost Per Unit (ACPU) cost limitation. This separate category also allows these costs to be isolated from energy efficiency costs in program evaluations. H&S costs that are budgeted and reported under the Program Operations category rather than the H&S category, the related H&S costs must be included in the calculation of the ACPU and cost-justified through the Grantee's Department of Energy (DOE)-approved energy audit tool.

Select which option used below.

Separate H&S Budget □

Contained in Program Operations ☑

### 3.0 - H&S EXPENDITURE LIMITS

Pursuant to 10 CFR 440.16(h), Grantees must establish H&S expenditure limits for their Program and provide justification for those limits by explaining the basis and related historical H&S expenditures. DOE acknowledges that it may be necessary for Grantees to deviate from historical expenditures when certain circumstances arise (e.g., funding source changes).

 $\underline{10 \ CFR \ 440.16(h)(2)}$  dictates that these limits must be expressed as a percentage of the ACPU. To calculate this percentage, use the following formula:

 $\textit{Total Average H\&S Cost per Unit} = \frac{\textit{H\&S budget amount}}{\textit{Program Operations budget amount}}$ 

For example, if the ACPU is \$5,000 and a Grantee's Program expends an average of \$750 per dwelling on energy-related H&S measures, the Total Average H&S Cost per Unit would equal 15 percent. DOE acknowledges that this percentage may vary significantly between Grantees due to different geographical areas and depending upon the availability of other funding sources, resource availability, etc. Low percentages should include a statement of what other funding supports H&S costs, while larger percentages will require greater justification and relevant historical support.

15 percent is not a maximum limit on H&S expenditures. DOE will conduct a secondary level of review on H&S Plans with a Grantee request of more than 15 percent of Program Operations used for H&S purposes. **DOE strongly encourages using the table below** in developing justification for the requested H&S budget amount. In accordance with 10 CFR 440.18(d)(15), these funds are to be

expended by the Program in direct weatherization activities, "of which is necessary before, or because of, installation of weatherization materials." This same section of the regulation excludes the H&S costs from the ACPU limitation if H&S costs are budgeted separately.

DOE recommends reviewing recent budget requests and compare those to actual H&S expenditures to see if previous budget estimates have been accurate. The resulting Total Average H&S Cost per Unit multiplied by the Grantee's production estimate in the Annual File should correlate to the H&S budget amount listed in the Grantee's annual plan.

H&S expenditure limits and justification explaining the basis for setting the limits.

Utilizing the spreadsheet embedded below, provide a full list of H&S measures using historical data from your program, including average cost, and frequency rate. If installing more than a single instance of one measure in a unit (e.g. multiple CO alarms), Grantees may aggregate costs so that frequency does not exceed 100%, or enter a justification into the measure column, which explains why that measure has a frequency rate of over 100%. The spreadsheet will auto calculate your expected Total Average H&S Cost per Unit.

Instructions: Double-click icon directly below to open, view and edit Measure Matrix Spreadsheet. Complete the spreadsheet by entering the required information. To save, close the spreadsheet and it will save to this document.

### 4.0 - INCIDENTAL REPAIR MEASURES

Any measures that could potentially be identified as H&S, but the Grantee chooses to instead identify and treat those measures as incidental repair measures (IRMs), must be implemented consistently throughout the Grantee's weatherization program. The measure must fit the regulatory definition of an IRM and be cost justified along with the associated energy conservation measure and/or package of measures. 10 CFR 440.3 defines Incidental Repairs as, "those repairs necessary for the effective performance or preservation of weatherization materials."

### H&S measures identified and treated as IRMs within your Program.

Incidental repairs necessary for installation of weatherization measures are NOT considered H&S, but will be added to the cost of the efficiency measure and included in the calculated savings to investment ratio (SIR). Such repairs include, but are not limited to:

- Protective covering for exterior hot water tanks installed by DOE WAP
- Repair of walls or window frames for room A/C installation
- Minor roof repair for solar hot water collector installation
- Sealing and weather-stripping to prevent air leakage from conditioned rooms to unconditioned spaces

# 5.0 – OCCUPANT PRE-EXISTING OR POTENTIAL HEALTH CONDITIONS AND HAZARD IDENTIFICATION AND NOTIFICATION FORM(S)

Grantees must develop a written policy that includes, at a minimum, the following documentation relating to H&S Plan implementation and maintain signed copies in each client file. <u>Each notification must include</u> the occupant(s) (and landlord if applicable) name and address, be signed and dated by the occupant (and landlord if applicable) indicating that they understand and have been informed of their rights and options and signed by the Subgrantee personnel collecting the information.

Required topics are:

### Occupant Pre-existing or Potential Health Condition Screening

- Provides documentation that allows occupant(s) to self-report known or suspected health concerns as part of initial application for weatherization, during the energy audit, or other part of the weatherization process as specified. Must minimally contain the following:
  - Any known risks associated with the measures and materials being installed
  - Subgrantee point of contact information for occupant(s)
  - Date of screening

### Hazard Identification Notification

- Provides documentation that the occupant and landlord (if applicable), have been informed of any potential hazards identified during the energy audit or intake process. Must minimally contain the following:
  - Date(s) of the energy audit/assessment and when the occupant(s) (and landlord, if applicable) was informed of a potential H&S issue
  - A clear description of the problem, including any testing results
  - A statement indicating if, or when weatherization could continue

### Radon Informed Consent Form

- Provides documentation that the occupant(s) (and landlord if applicable) have been informed of any potential hazards associated with radon in weatherized dwellings. The form must minimally contain the following:
  - An explanation on the potential small risk of increasing radon levels when building tightness is improved. This
    is based on the results of the <u>Buildings Assessment of Radon Reduction Interventions with Energy retrofits</u>
    <u>Expansion Study (The BEX Study)</u>
  - A list of precautionary measures WAP will install based on <u>EPA Healthy Indoor Environment Protocols.</u>
  - Some of the benefits of Weatherization including energy savings, energy cost savings, improved home comfort, and increased safety.

### Procedure for soliciting occupants' health and safety concerns related to components of their homes

During application intake or home assessment/audit, subgrantees will determine if a person's health may be at-risk and/or the work activities could constitute a health or safety hazard. The occupant at-risk will be required to take appropriate action based on severity of risk. Failure or the inability to take appropriate actions must result in a deferral. Failure or the inability to take appropriate actions must result in a deferral.

At the time of application or during the home assessment/audit, the occupant must complete a "Client Health Survey" identifying potential health issues of the applicant and all occupants of the dwelling. This survey will be inserted into the client file for future reference. The information collected during this process will be used to aid in determining the best material and course of action for the weatherization process. When an occupant's health is fragile and/or work activities would constitute a health or safety hazard, the occupant(s) at-risk will be required to leave the home during work activities. If the occupant is unable to leave the home and the intended work may exacerbate an occupant's health condition, the home may need to be deferred.

## Procedure for determining whether occupants suffer from health conditions which may be negatively impacted by the act of weatherizing their dwelling

Occupants at-risk will be asked to leave the home during weatherization work to make sure weatherization work does not make health conditions worse. If at-risk occupants cannot be relocated during weatherization work, then the home will be deferred. Training will be provided on how to assess occupant pre-existing conditions and determining course of action is required.

### Procedure for addressing potential health concerns including pre-existing health conditions when they are identified

Subgrantees will have the occupant complete a "Client Health Survey" and inform the occupant in writing of any known risks. The subgrantees will provide the occupant with subgrantee point of contact information. Occupants at-risk will be asked to leave the

home during weatherization work to make sure weatherization work does not make health conditions worse. If at-risk occupants		
cannot be relocated during weatherization work, then the home will be deferred. Training will be provided on how to assess		
occupant pre-existing conditions and determining course of action is required.		
Location where forms have been uploaded/submitted		
Separate attachment to SF424 ☐ Separate attachment to H&S Plan ☑		

### 6.0 – HEALTH AND SAFETY CATEGORIES

For each of the following H&S categories identified by DOE in the following tables, follow the directions below.

- Any section that is "Required" below must be explicitly detailed in the H&S Plan regardless of funding source used. If the Grantee checks the box for "Concurrence with DOE Guidance" the contents of the box may be left as it exists or reference the section/location within Grantee Policy and Procedure manual that contains language or insert Grantee specific language. If the "Alternative Guidance" box is checked, the Grantee must provide that alternative guidance in the box.
  - If a Grantee is proposing an alternative action/allowability for a "Required" item, the alternative requires comprehensive explanation of how it meets the intent of the DOE program notice.
  - If a "Required" item/category will not be addressed with any funding source and will always result in deferral, the H&S Plan must state that.
- Any section that is "Allowable" below must be detailed only if DOE WAP funds are used to implement the measures. If the Grantee uses DOE funds for any "Allowable" activities from the Table of Issues then they must be described here in detail, including defining "minor", "major", "limited", "case-by-case", and "at-risk" if the term is applied. If you only check the box "Allowed with Alternative Funds" then no additional information is required.
- Any section that is "Prohibited" below may not be addressed with DOE WAP H&S funds and does not need to be specifically addressed in the H&S Plan. The Grantee simply needs to check the "Concur with DOE guidance" box and indicate if the condition will result in deferral/referral.
- The Grantee H&S Plan may address additional H&S hazards specific to their program that are not included in the Table of Issues. If a Grantee chooses to include additional measures as DOE WAP funded H&S costs, the H&S Plan must include details pertaining to the measures allowed, testing required, and client education for these specific hazards.
- All required "Testing/Inspection" related items must be documented in the client file to verify completion and results.

61 – Air Conditioni	ng Hoating Sys	toms and Co	mbustion Appliances	
6.1 – Air-Conditioning, Heating Systems, and Combustion Appliances  Required Actions				
Concur with DOE Guidance ☑	Alternative 0		Results in Deferral/Referral □	
DOE WAP H&S Funds ☑	7 ((C) (1) (C)		Alternative Funds	
	repair, or installati	on with DOE fund	Is as there are no heating systems in grantee's	
Room air conditioners are small packaged air chave an energy efficiency rating (EER), which is power used. The federal government requires the EER. The higher the EER, the more efficient units with a maximum EER of 9.7 are eligible for standards in the Clean Air Act 1990, Section 60 EPA-approved section 608 type I or universal cwhen possible.	computed by divid all air conditioners the air conditioner or replacement.Repl 8, as implemented	ing cooling capaci to carry a yellow e and the lower its aced units will be by 40 CFR 82 (7/1	ity, measured in btu's per hour by the watts of energy label listing cost-of-operation, including soperating cost. Under Hawaii's WAP, existing e disposed of according to the environmental L/2006). Materials shall be disposed of by an	
If repair/replacement is beyond the project sconotified in writing by the "Weatherization Defe When serious electrical hazards, gross overload owner and defer the proposed installation of w	erral/Referral" form ds, or electrical wiri	, and, if possible, ng exposure are p	referred to local agencies that could assist. oresent, the energy auditor shall notify the	
	Allowable	e Actions		
Allowed with DOE WAP H&S Fund	ds ☑	A	llowed with Alternative Funds □	
	Prohibited			
	Concur with DO			
There will be no heating system replacement,	•		s as there are no heating systems in Hawaii.	
	Required Testi	ng/Inspection		
Concur with DOE Guidance			Alternative Guidance	
WAP auditors/assessors will test any existing r				
replacement room A/C unit that meets the crit				
	antee Combustion			
Conduct combustion appliance testing and visu	•			
	_	on/testing policy	including actions/limits	
Concur with DOE Guidance	_		Alternative Guidance	
Fireplace or woodstove venting that is left ope	rational after weatl	nerization must m	neet current local or national standards or the	
home must be deferred.	Required Occup	ant Education		
	REGULEO UCCUI	JOHN EUULANION		

Concur with DOE Guidance 🗹	Alternative Guidance □
Auditors/Assessors will provide client education or	n appropriate operation and maintenance of A/C units. An operation manual
and any warranty information will be left with the	client. Subgrantees will provide all paperwork and manuals for any equipment
installed by weatherization.	
6.2 Ashastas (Confirmad	and for Procumed Achastas Containing Material)
6.2 – Asbestos (Committed	and/or Presumed Asbestos Containing Material)  Required Actions
Concur with DOE Guidance ☑	Alternative Guidance  Results in Deferral/Referral
DOE WAP H&S Funds ☑	Alternative Funds
	rocess shall be inspected for asbestos prior to alteration. Crews and contractors
	al. Testing or abatement of asbestos is not an allowable H&S expense. If
,	bed during weatherization, the client must provide documentation that the
· · · · · · · · · · · · · · · · · · ·	by a certified professional before the home is eligible for weatherization.
Clients shall be instructed not to disturb any suspe	cted surface and given the EPA pamphlet "Asbestos in the Home, a
Homeowners Guide."	
	perform weatherization due to the presence of asbestos. If possible, clients will
expertise to perform asbestos removal. No asbesto	y agencies, referral services and private contracts who are licensed and have
expertise to perform aspestos removal. No aspesto	is removal work will be performed.
DOE WAP funding will not be used for testing or re	moval of vermiculite. The presence of vermiculite in Hawaii is unlikely as we do
not look in attics. Hawaii does not perform any insi	ulation, air sealing, or blower door testing. All measures are baseloads.
However, auditors/assessors will be trained to reco	ognize vermiculite and notify client of its presence. If vermiculite is present in a
	, the client will be notified and instructed not to disturb any suspected surface.
	pestos in the Home, a Homeowners Guide." The unit would be deferred until
·	ovide documentation that a certified professional performed the remediation
	s will take precautionary measures, such as not disturbing the vermiculite and
	containing vermiculite. Testing or abatement of asbestos is not an allowable
H&S expense.	
	Grantee ACM policy
	bly disturb the material. If possible, the client will be referred to local agencies
if vermiculite is present.	
	d Emergency Response Act (AHERA) course to be able to identify asbestos-
containing materials and when it may pose a hazard	
	oor Testing Policy When Suspected ACM Exists
•	or blower door testing. All measures are baseloads. However, iculite and notify clients of its presence. DOE WAP funding will not be used for
_	iscovered, the client will be notified and instructed not to disturb the material.
cesting of removal of verificance. If verificance is a	Allowable Actions
Allowed with DOE WAP H&S Funds ☑	
f any asbestos is identified, auditors/assessors will	notify and instruct the client not to disturb the suspected surface.
	of asbestos hazard identified, and the client will be deferred until they can
	ncapsulation was conducted by a certified professional before the home is
eligible for weatherization.	
	Prohibited Actions
	oncur with DOF Guidance 🔽

Using DOE WAP funds for general abatement/rem	oval or replacement of asbestos sig	ding, thermal system insulation (TSI) or
Transite, or vermiculite.		
	Required Testing/Inspection	
Concur with DOE Guidance ☑	Alternative Guidance □	Results in Deferral/Referral □
DOE WAP H&S Funds ☑		Alternative Funds □
Visually inspect all surfaces (i.e., walls, floors, ceil	ings, roofs) for suspected ACM pric	r to drilling or cutting.
Assume asbestos is present in suspect materials u	ınless testing reveals otherwise.	
	Allowable Testing/Inspection	
Allowed with DOE WAP H&S Funds &	Ž Alic	wed with Alternative Funds
If asbestos is present in any area which will be dis	turbed during weatherization, the	asbestos must be remediated prior to
weatherization work using non-DOE funds.		
	Required Occupant Education	
Concur with DOE Guidance ☑		Alternative Guidance □
<ul> <li>Formally notify the occupant, and landlore</li> </ul>	if applicable, in writing:	
<ul> <li>of suspected ACMs that are present are</li> </ul>	nd what precautions will be taken t	o ensure the occupants' and workers' safety
during weatherization;		
<ul> <li>of results if testing was performed;</li> </ul>		
<ul> <li>not to disturb suspected ACM;</li> </ul>		
<ul> <li>When deferral is necessary due to asb</li> </ul>	estos, occupant, or landlord if appl	icable, must provide documentation that a
certified professional performed the re	emediation before work continues.	
		10.1
6.3 – Biolo	ogicals and Unsanitary Cond	ditions
	Required Actions	
Concur with DOE Guidance 🗹	Alternative Guidance	Results in Deferral/Referral   ———————————————————————————————————
DOE WAP H&S Funds ☑		Alternative Funds
Deferral where conditions (odors, bacteria, raw sewage, rotting wood, etc.) in the home pose a health risk to occupants and/or		
weatherization workers or may be worsened by weatherization activities (e.g., air sealing) and will not be resolved by		
weatherization.		
Remediation of conditions that may lead to or promote biological concerns and unsanitary conditions is allowed. Addressing		
bacteria and viruses is not an allowable cost. Deferral may be necessary in cases where a known agent is present in the home		
that may create a serious risk to occupants or we		· ·
lead to or promote biological concerns or unsanit		
a home. Disposal of all moisture damaged materi		
scope of DOE WAP, client will be asked to correct	•	,
Deferral may be necessary in cases where a know	n agent is present in the nome tha	t may create a serious risk to occupants or
weatherization workers.	Allowed Actions	
Allowed with DOE WAP H&S Funds		owed with Alternative Funds
DOE funds may be used to remediate conditions		
•	,	ical concerns of unsamitary conditions. This
would typically be a plumbing leak or water drainage under a home.		
Required Testing/Inspection  Concur with DOE Guidance ☑ Alternative Guidance □ Results in Deferral/Referral □		
DOE WAP H&S Funds	Alternative Guidance L	Alternative Funds
	subspaces of the dwelling	Alternative runus 🗖
	subspaces of the dwelling.  Prohibited Testing/Inspection	Alternative runus 🗖

Using DOE WAP funds for any testing/evaluation of structural materials by a third-party.			
Required Occupant Education			
Concur with DOE Guidance	<b>☑</b>		Alternative Guidance □
Inform occupant in writing of observed biological	gical and unsanitary	conditions.	
6.4 – Building Stru	cture and Roofi	ng (e.g., roofing,	wall, foundation)
		e Actions	,
Allowed with DOE WAP H&S Fur	nds 🗹	Allov	ved with Alternative Funds
Building structure and major roofing repairs	are not allowable. N	ninor roof repairs and	construction of enclosures to protect and
preserve DOE WAP installed hot water tanks			
must meet the SIR. If the repairs and installa	ition cost cannot me	et the SIR for the wea	therization measure, the unit will be
deferred. Homes with building structure, ma	ajor roofing repairs, o	or require more than	minor repairs are not allowable with DOE
funds and must be deferred. WAP auditors/	assessors will ensure	that access to areas	necessary for weatherization is safe for
entry and performance of assessment, work	, and inspection. Bui	Iding structure and m	ajor roofing repairs are not allowable.
There will be no removal or disposal of struc	tural or roofing mat	erials.	
	Prohibite	ed Actions	
	Concur with DO	DE Guidance 🗹	
Major repairs and building rehabilitation are	not allowable with	DOE funds.	
	Define "ma	jor" repairs	
"Major" repairs are defined as a repair exce	eding the projected	average cost per unit	during the given program year.
	Required Test	ing/Inspection	
Concur with DOE Guidance ☑	Alternative	Guidance 🛮	Results in Deferral/Referral □
DOE WAP H&S Funds 🏻			Alternative Funds □
Visual inspection of building structure and ro	ofing for damages th	nat compromise build	ing durability and to verify that portions of
the home where weatherization will occur ar	e safe for entry and	performance of asses	sments, work, and inspections.
Allowable Testing/Inspection			
Allowed with DOE WAP H&S Funds ☑ Allowed with Alternative Funds ☑			
Visual inspection of building structure and roofing for damages that compromise building durability and to verify that portions of			
the home where weatherization will occur are safe for entry and performance of assessments, work, and inspections.			
Prohibited Testing/Inspection			
		DE Guidance ☑	
Using DOE WAP H&S funds for any testing/ev			-party is prohibited.
	•	pant Education	
Concur with DOE Guidance			Alternative Guidance
Notify occupant in writing of structurally compromised areas.			

6.5 – Code Compliance		
Allowable Actions		
Allowed with DOE WAP H&S Funds ☑ Allowed with Alternative Funds □		

DOE funds will be used to comply with local codes in the installation of weatherization materials. Correction of pre-existing code violations in a dwelling is not allowed unless the code corrective action is required due to the installation of a weatherization measure. When correction of pre-existing code compliance issues is triggered and paid for with DOE funds, cite specific code requirements in the client file. Local building code requirements must be followed at all times. This is particularly important when installing solar hot water systems and hybrid hot water heat pump units. If the cost of meeting code compliance is excessive and beyond the allowable average cost for the efficiency measure according to the SIR, the unit should be deferred until alternative sources of funds are identified to correct the problems. Clients will be referred to other programs or agencies if necessary to bring the unit up to code. Work must meet current applicable code requirements. Work will include obtaining permits and inspection from the local building departments when required. Condemned properties and properties where "red tagged" H&S conditions exist that cannot be corrected under this guidance must be deferred.

**Prohibited Actions** 

Concur with DOE Guidance ☑			
Using DOE WAP funds for correction of pre-existing code compliance issues not directly related to the installation of specific			related to the installation of specific
weatherization measures in the home.			
Using DOE WAP funds for work on condem	ned properties and pro	operties where H&S co	onditions exist that cannot be corrected
under this guidance.			
	Required Testi	ing/Inspection	
Concur with DOE Guidance   ✓	Alternative Guidance  Results in Deferral/Referral		Results in Deferral/Referral
DOE WAP H&S Funds ☐ Alternative Funds ☐			Alternative Funds □
Visual inspection.			
Allowable Testing/Inspection			
Allowed with DOE WAP H&S Funds ☑ Allowed with Alternative Funds □			
Visual inspection.			
Required Occupant Education			
Concur with DOE Guidance ☑ Alternative Guidance □			
Inform occupant in writing of observed code compliance issues when it results in a deferral.			

6.6 – Electrical			
	Required	Actions	
Concur with DOE Guidance ☑ Alternative Guidance □ Results in Deferral/Referral □		Results in Deferral/Referral □	
DOE WAP H&S Funds ☑ Alternative Funds □		Alternative Funds □	
Provide sufficient over-current protection and damming prior to insulating building components containing knob and tube wiring,			
as required by the AHJ.			
Allowable Actions			
Allowed with DOE WAP H&S Funds ☑ Allowed with Alternative Funds □			ed with Alternative Funds 🛘

Minor electrical repairs are allowed where health and safety of the occupant or worker is at-risk. Upgrades and repairs are allowed when necessary to perform specific weatherization measures. Typical repairs may be installing switch plate or outlet protectors, replace ceramic light bulb fixtures, or other means to eliminate exposed wiring. Repair or replacement of faulty electrical outlets for A/C, solar thermal DHW, water heater, or refrigerators is also allowable. Upgrades and repairs for weatherization measure are allowable such as relocation of electrical outlet to allow a gas dryer to be relocated for proper ventilation or proper connection of an existing water heater. Visual inspection will be performed. WAP auditors/assessors will check for alterations that may create an electrical hazard. Voltage drop and voltage detection testing are allowed.

Since no attic insulation will be installed in Hawaii, there will be no inspection for knob-and-tube wiring. If know-and-tube wiring is discovered, the client will be referred to other programs as this is beyond the project scope. Any electrical materials removed from homes will be disposed of per EPA guidelines.

### **Prohibited Actions**

Concur with DOE Guidance   ✓			
Using DOE WAP funds for major electrical repairs as defined by Hawaii's H&S Plan.			
	Define "ma	jor" repairs	
"Major" electrical repairs are considered a	s serious electrical haz	ards, gross overloads,	or electrical wiring exposure present.
Auditors/Assessors shall notify the owner	and document in the c	lient's file. In such con-	dition, the client shall be deferred to
resolve such major problems prior to the i	nstallation of weatheri	zation services, ensuri	ng electrical baseload is within the
electrical safety standards.			
	Required Testi	ing/Inspection	
Concur with DOE Guidance 🗹	Alternative (	Guidance □	Results in Deferral/Referral □
DOE WAP H&S Funds			Alternative Funds □
<ul> <li>Visual inspection for presence and</li> </ul>	condition of knob-and-	tube wiring.	
<ul> <li>Evaluate knob-and-tube wiring for</li> </ul>	safety prior to work.		
<ul> <li>Check for alterations that may crea</li> </ul>	te an electrical hazard		
·	Allowable Test		
Allowed with DOE WAP H&S F			ed with Alternative Funds
Voltage drop and voltage detection testing	g.		
	Required Occup	pant Education	
Concur with DOE Guidance	·		Iternative Guidance
Provide occupant with written docu	umentation of any elec	trical hazards identifie	d that will not be addressed by
weatherization	a		
	n over-current protecti	on, overloading circuit	s, and basic electrical safety/risks if
<ul> <li>Provide information to occupant on over-current protection, overloading circuits, and basic electrical safety/risks if conditions warrant.</li> </ul>			
6.7 – Fuel Leaks			
	Required	Actions	
Concur with DOE Guidance ☑	Alternative (		Results in Deferral/Referral
DOE WAP H&S Funds	<u> </u>		Alternative Funds
When a gas leak is found on the uti	lity side of service, the	utility service must be	contacted, work must be temporarily
halted, and the leak must be repaired before work may proceed.			
<ul> <li>Fuel leaks that are the responsibility of the occupant (vs. the utility) must be repaired before installing weatherization</li> </ul>			
measures in the home.			
Allowable Actions			
Allowed with DOE WAP H&S F			ed with Alternative Funds
Auditors/Assessors will notify the client's u			
responsibility to the utility to address.			
Prohibited Actions			
Concur with DOE Guidance ☑			
Using DOF WAP funds to renair leaks that			
Using DOE WAP funds to repair leaks that are the responsibility of the utility to correct.  Environmental cleanup resulting from bulk fuel leaks using DOE WAP funds.			
Required Testing/Inspection			
Concur with DOE Guidance ☑ Alternative Guidance □ Results in Deferral/Referral □			
DOE WAP H&S Funds   Alternative Guidance   Alternative Funds   Alt			
DOE W/ II MOST GIROS E			Atternative rands =

- Test all exposed gas lines, fittings, valves, and connections for fuel leaks from utility connection to the appliance throughout the home. Test all gas appliances for fuel leaks at all connections, valves, fittings, and burners. Conduct sensory inspection of all bulk fuels lines and storage tanks to determine if leaks exist. Allowable Testing/Inspection Allowed with Alternative Funds □ Allowed with DOE WAP H&S Funds ☑ WAP crews should be trained on fuel leak testing. **Prohibited Testing/Inspection** Concur with DOE Guidance ☑ Using DOE WAP funds for environmental testing of soil or water. **Required Occupant Education** Concur with DOE Guidance ☑ Alternative Guidance □ Inform occupants in writing of fuel leak testing results, including specific location if fuel leaks are detected. 6.8 – Gas Ovens/Stovetops/Ranges **Allowable Actions** Allowed with DOE WAP H&S Funds ☑ Allowed with Alternative Funds □ Not applicable as this is not a measure on approved priority list. **Prohibited Actions** Not applicable as this is not a measure on approved priority list. **Required Testing/Inspection** Concur with DOE Guidance ☑ Alternative Guidance Results in Deferral/Referral □ Alternative Funds □ DOE WAP H&S Funds ☑ Not applicable as this is not a measure on approved priority list. Define action levels for oven CO testing and resulting actions Not applicable as this is not a measure on approved priority list. Allowable Testing/Inspection Allowed with DOE WAP H&S Funds 

  ✓ Allowed with Alternative Funds □ Not applicable as this is not a measure on approved priority list. **Required Occupant Education** Concur with DOE Guidance ☑ Alternative Guidance □ Not applicable as this is not a measure on approved priority list. 6.9 – Hazardous Materials **Required Actions** Concur with DOE Guidance ☑ Alternative Guidance □ Results in Deferral/Referral □ DOE WAP H&S Funds ☑ Alternative Funds □ Hazardous Waste Materials generated by weatherization work (e.g., refrigerant, asbestos, lead, mercury, CFL lighting
- - bulb/ballasts, etc.) must be disposed of according to all local and federal laws, regulations, and guidelines, as applicable. Costs specifically related to disposal may be charged as a H&S expense.
  - Subgrantees must document disposal requirements in contract language with the responsible party.
  - Limited removal of pollutants that pose a risk to workers is required (e.g., flammable liquids, hazardous chemicals, and other air pollutants) as defined the Grantee's H&S Plan.
  - If removal cannot be performed or is not allowed by the occupant, the unit must be deferred.

Define "limited" removal of pollutants			
"Limited" removal of pollutants is defined as only removing pollutants that are necessary to perform weatherization work (oil paint cans, oil in garages, etc.) and if the pollutants pose a risk to workers.			
	Allowabl	e Actions	
Allowed with DOE WAP H&S Fu	ınds 🗹	Allow	ed with Alternative Funds
"Limited" removal of pollutants that	t pose a risk to the oc	cupant or worker is all	owable.
	Prohibite	d Actions	
	Concur with DC	DE Guidance 🗹	
Using DOE WAP funds for Lead, Asbestos, ar	nd Radon abatement.		
-		ing/Inspection	
Concur with DOE Guidance ☑	Alternative (		Results in Deferral/Referral □
DOE WAP H&S Funds ☑	1		Alternative Funds
Sensory inspection.			
, .	Allowable Test	ing/Inspection	
Allowed with DOE WAP H&S Fu			ed with Alternative Funds
Visual inspection to identify hazardo ballasts, etc.).	ous waste materials (e	e.g., refrigerant, asbest	os, lead, mercury, CFL lighting bulb,
·	Prohibited Test	ting/Inspection	
	Concur with DC		
Using DOE WAP funds for any testing for hazardous materials other than that specifically permitted in the asbestos, lead, and radon sections of this document.			
	Required Occu	pant Education	
Concur with DOE Guidance ☑ Alternative Guidance □			
<ul> <li>Inform occupant in writing of hazards associated with hazardous waste materials being generated/handled in the home.</li> </ul>			
<ul> <li>Inform occupant in writing of observed hazardous condition and associated risks.</li> </ul>			
<ul> <li>Provide occupant written materials on safety issues and proper disposal of household pollutants.</li> </ul>			
6.:	10 - Injury Preve	ntion of Occupan	ts
	Allowabl	e Actions	
Allowed with DOE WAP H&S Fu	ınds 🗹	Allow	ed with Alternative Funds
Workers must take all reasonable precautions against performing work on homes that will subject workers or occupants to health			
and safety risks. Minor repairs and installation	on may be conducted	only when necessary	to effectively weatherize the home.
Otherwise, these measures are not allowed	. WAP auditors/assess	sors will inform clients	of dangerous and unsafe condition of the
home, and will be referred to other local social service agencies if repair/replacement is beyond the project scope.			
	Prohibite	d Actions	
	Concur with DC	DE Guidance 🗹	
Using DOE WAP funds for major repairs, as o	defined by Hawaii's H	&S Plan.	
	Define "ma	jor" repairs	
"Major" repairs are defined as any repair e	xceeding the projecte	d average cost per uni	t during the given program year.
DOE funds will not be used to make genera	I home repairs. Stairs	, handrails, and other g	general repairs will not be made with DOE
funds. Clients will be referred to other local social service agencies if repair/replacement is beyond the project scope. If worksite			nt is beyond the project scope. If worksite
is not safe, weatherization work will be deferred until a safe work environment can be provided by the client.			
Required Testing/Inspection			
Concur with DOE Guidance 🗹		Guidance □	Results in Deferral/Referral □

DOE WAP H&S Funds ☑	Alternative Funds □		
Visually inspect for dangers that would prevent weatherization.			
Allowable Testing/Inspection			
Allowed with DOE WAP H&S Funds   ✓	Allowed with Alternative Funds □		
Visually inspect for dangers that would prevent weatherization.			
Required Occu	pant Education		
Concur with DOE Guidance   ✓	Alternative Guidance		
If identified hazardous conditions will not be corrected during we	eatherization, inform occupant in writing of observed hazards and		
associated risks utilizing the "Hazard Identification Notification Fo	orm" required by WPN 22-7.		
6.11 – Lead-Based Surface Coverin	ngs (Paint, Varnishes, Roofing, etc.)		
Required	d Actions		
Concur with DOE Guidance ☑ Alternative (	Guidance ☐ Results in Deferral/Referral ☐		
DOE WAP H&S Funds ☑	Alternative Funds □		
DOE funds will be used for lead paint testing, site set-up, clean-up	p, and verification on all pre-1978 homes. Work that disturbs		
painted surfaces on pre-1978 housing must be in accordance with	h the EPA's Lead RRP requirements. All testing, job site set-up,		
and clean up must be supervised by a Certified Renovator and each	ch crew member must be accompanied by a Certified Renovator		
Typical work that may disturb lead paint in pre-1978 homes could	d include window or through wall room air conditioners. Only		
those costs directly associated with lead safe work practices for s			
allowable H&S expenses. Solar or hybrid hot water system installe			
LSW. Refer to Hawaii's Field Guide for more information on LSW			
affected beyond the minimum levels for these measures, but if it	•		
arrected beyond the minimal levels for these measures, but inte	will, the job will be deferred.		
Deferral is required when the extent and condition of lead-based	naint in the house would notentially create further health and		
safety hazards. If it appears that extensive amounts of lead paint			
·	·		
safety hazards, the client will be notified that the job will be deferred.			
Allowable	le Actions		
Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds □		
Only those costs directly associated with lead safe work practices for surfaces directly disturbed during weatherization activities			
are allowable H&S expenses.			
Prohibited Actions			
	DE Guidance ☑		
Using DOE WAP funds for lead abatement.			
Using DOE WAP funds for purchase, resourcing, or maintenance of	of X-ray Fluorescence (XRF) devices.		
Allowable Testing/Inspection			
Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds □		
Testing to determine the presence of lead on surfaces that will be			
approved testing methods. If EPA-approved testing is not conduct	•		
compliance with EPA RRP rules. Job site set-up and cleaning verifi	,		
	pant Education		
Concur with DOE Guidance 🗹	Alternative Guidance		
Follow pre-renovation education requirements per EPA RRP rules			
acknowledge with signature, the most current EPA "Renovate Rig			
auditors/assessors will provide information in writing describing of			
- auditurs/assessurs will brovide illiotillation III Willing DESCHOINE (	conditions that must be then in older for WeatherMation to		

commence.

6.12 – Mold and Moisture		
Allow	rable Actions	
Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds □	
Hawaii will not be correcting any mold and moisture problen	ns. If these problems are encountered during assessment, the home	
will be deferred until problems are resolved. Suspected mole	or severe moisture problems will be identified, using sight and	
smell, during the early stages of an assessment and a determ	ination made of the severity or extent of the problem. If the	
problem is too severe to weatherize the home, client will be	notified, and job deferred until problem is resolved.	
Limited water damage repairs that can be addressed by weatherization workers are allowed when necessary in order to weatherize the home and to ensure the long-term stability and durability of the measures. Source control (i.e., correction of moisture and mold creating conditions) is allowed when necessary in order to weatherize the home and to ensure the long-term stability and durability of the measures. Source control is independent of latent damage and related repairs. Correction of minor drainage, gutters or down spouts to direct rainwater away from the building is allowable if within the cost limitations. Installation of gutters, down spouts, extensions, flashing, sump pumps, and landscape is not an allowable cost. Surface preparation where weatherization measures are being installed (i.e., cleaning mold off window trim in order to apply caulk) must be charged as part of the ECM, not to the H&S budget category. Disposal of any material removed from the structure will be done in an environmentally acceptable manner.  Prohibited Actions		
	n DOE Guidance 🗹	
Using DOE WAP funds for mold cleanup.	TOOL Galdance Ed	
Using DOE WAP funds for window and door replacements.		
•	esting/Inspection	
· · · · · · · · · · · · · · · · · · ·	ive Guidance  Results in Deferral/Referral	
DOE WAP H&S Funds ☑	Alternative Funds □	
Visual assessment for moisture or mold damage including exterior drainage.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds □	
Diagnostics such as material moisture content, or relative humidity measurements at the audit and/or final inspection.		
	Testing/Inspection	
Concur with DOE Guidance ☑		
Using DOE WAP funds for mold testing of any type.	DOL Galdanie E	
	ccupant Education	
Concur with DOE Guidance ☑	Alternative Guidance	
Provide occupant written notification of identified mold/moisture hazards and information regarding the associated hazard.		
Trovide occupant whiten notineation of facilities mora, mora	tare nazaras and information regarants the associated nazara.	
6.13 - Occupant Pre-existing or Potential Health Conditions		
·	ired Actions	
Concur with DOE Guidance 🗹 Alternat	ive Guidance  Results in Deferral/Referral	
DOE WAP H&S Funds ☑	Alternative Funds □	

During application intake or home assessment/audit, subgrantees will determine if a person's health may be at-risk and/or the work activities could constitute a health or safety hazard. The occupant at-risk will be required to take appropriate action based on severity of risk. Failure or the inability to take appropriate actions must result in a deferral. Failure or the inability to take appropriate actions must result in a deferral.

At the time of application or during the home assessment/audit, the occupant must complete a "Client Health Survey," identifying potential health issues of the applicant and all occupants of the dwelling. This survey will be inserted into the client file for future reference. The information collected during this process will be used to aid in determining the best material and course of action for the weatherization process. When an occupant's health is fragile and/or work activities would constitute a health or safety hazard, the occupant(s) at-risk will be required to leave the home during work activities. If the occupant is unable to leave the home and the intended work may exacerbate an occupant's health condition, the home may need to be deferred.

to leave the nome and the interiored work may exacerbate an occupant 3 health condition, the nome may need to be deferred.			
Allowable Actions			
Allowed with DOE WAP H&S Funds ☑		Allowed with Alternative Funds □	
Occupants at-risk will be asked to leave ho	Occupants at-risk will be asked to leave home during weatherization work to make sure weatherization work does not make		
health condition worse. If at-risk occupants cannot be relocated during weatherization work, then the home will be deferred.			
Training will be provided on how to assess occupant pre-existing conditions and determining course of action is required.			
	Required Test	ing/Inspection	
Concur with DOE Guidance ☑	Alternative (	Guidance 🗆	Results in Deferral/Referral □
DOE WAP H&S Funds ☑ Altern		Alternative Funds □	
Screen occupants for known or suspected health concerns during the home assessment/audit by utilizing the "Client Health			
Survey" that identifies any known risks associated with the measures and materials being installed, Subgrantee point of contact			
information for occupants, and date of screening.			
Allowable Testing/Inspection			
Allowed with DOE WAP H&S Funds ☑		Allowed with Alternative Funds □	
If at-risk occupants cannot be relocated during weatherization, the home shall be deferred.			
Required Occupant Education			
Concur with DOE Guidance ☑ Alternative Guidance □			
<ul> <li>Inform occupant in writing of any known risks and provide pre-weatherization screening form.</li> </ul>			
<ul> <li>Provide occupant with Subgrantee point of contact information in writing.</li> </ul>			
Inform occupant in writing of any known risks and provide pre-weatherization screening form.			

6.14 – Pests			
Required Actions			
Concur with DOE Guidance 🗹	Alternative Guidance  Results in Deferral/Referral		
DOE WAP H&S Funds 🖸	Ĭ P		Alternative Funds □
Deferral of homes where infestation of pests cannot be reasonably removed or poses H&S concern for workers.		&S concern for workers.	
Allowable Actions			
Allowed with DOE WAP H&S Funds ☑		Allowed with Alternative Funds □	
Pest removal is allowed only where infestation would prevent weatherization. If the presence of pests interferes with			
weatherization, job will be deferred until pests are removed.			
Allowable Testing/Inspection			
Allowed with DOE WAP H&S Funds ☑		Allowed with Alternative Funds □	
Assessment of presence and degree of infestation and risk to workers.			
Required Occupant Education			
Concur with DOE Guidance ☑ Alternative Guidance □		lternative Guidance 🛚	
Inform occupant in writing of observed conditions and associated risks.			

	6.15 –	Radon	
	Required	Actions	
Concur with DOE Guidance 🗹	Alternative (	Guidance 🗆	Results in Deferral/Referral
DOE WAP H&S Funds 🛭			Alternative Funds □
Since homes will not be sealed due to nat			radon. Only baseload measures will be
installed which should not affect infiltration	on or concentration of	radon in homes.	
	Allowable		
Allowed with DOE WAP H&S F			yed with Alternative Funds □
Clients will be referred to EPA and EPA co		•	rns about radon.
	Prohibite		
	Concur with DC	E Guidance ☑	
Using DOE WAP funds for radon mitigation.			
	Allowable Test	•	
Allowed with DOE WAP H&S F	unds ☑	Allow	red with Alternative Funds □
No DOE funding will be used for radon test	ing.		
	Required Occu	oant Education	
Concur with DOE Guidance ☑ Alternative Guidance □		Alternative Guidance 🏻	
<ul> <li>Provide all occupants EPA's A Citize</li> </ul>	n's Guide to Radon an	d inform them of rado	on related risks.
<ul> <li>Occupants must sign an informed continuous</li> </ul>	onsent form prior to re	eceiving weatherization	on services.
6.16 – Safety Devices:	Smoke and Carbo	n Monoxide Ala	rms, Fire Extinguishers
•	Required		,
Concur with DOE Guidance ☑	Alternative (		Results in Deferral/Referral
DOE WAP H&S Funds	1		Alternative Funds □
Install CO alarms in every home where alari	ms are not present or	are inoperable in com	pliance with ASHRAE 62.2-2016 which
references NFPA 720 (note: NFPA 720 has b	•	•	
	Allowable	Actions	
Allowed with DOE WAP H&S F	unds 🗹	Allow	red with Alternative Funds □
Install smoke alarms is allowed where dete	ectors are not present	or are inoperable. Rej	place functional smoke alarms and carbon
monoxide alarms if they are beyond the manufacturer's stated lifetime (usually 10 years). Replace functional smoke or carbon			
monoxide alarm batteries if designed to be replaceable.			
Prohibited Actions			
Concur with DOE Guidance			
Using DOE WAP funds for replacement of functional smoke or carbon monoxide alarms that are not beyond the manufacturer's			
stated lifetime.			
Required Testing/Inspection			
Concur with DOE Guidance 🗹	Alternative (	Guidance 🗆	Results in Deferral/Referral
DOE WAP H&S Funds 🛭	1		Alternative Funds □
WAP auditors/assessors will test existing smoke alarms and carbon monoxide detectors for operation and age of installed safety			
devices.			
Allowable Testing/Inspection			
Allowed with DOE WAP H&S Funds ☑ Allowed with Alternative Funds □			
WAP auditors/assessors will test existing smoke alarms and carbon monoxide detectors for operation and age of installed safety			
devices.			
Required Occupant Education			
Concur with DOE Guidance ☑ Alternative Guidance □			

Provide occupant with verbal and written information on use	of newly installed devices	and the potential risks of not properly	
maintaining these devices.			
6.17 – Ventilation	and Indoor Air Qua	lity	
Requ	red Actions		
Concur with DOE Guidance ☑ Alternati	ve Guidance 🛚	Results in Deferral/Referral	
DOE WAP H&S Funds		Alternative Funds □	
Whole house ventilation and local exhaust provisions of ASHR		· ·	
for homes where both mechanical cooling is present, and the	_		
of ASHRAE 62.2 – 2016 such as separating air movement from	attached garages and pro	pperly venting dryers will be enforced.	
Deferral is required for homes where both mechanical cooling	-		
Homes must also be deferred where guidance within this plan		<u> </u>	
concerns, or the presence of unacceptable air quality as identi		· · · · · · · · · · · · · · · · · · ·	
the scope of this guidance will be deferred and referred to ser	_		
or health and safety concern. If the occupant refuses ventilation		62.6, the home must be deferred.	
	able Actions		
Allowed with DOE WAP H&S Funds ☑		ed with Alternative Funds	
Hawaii homes are in Climate Zone I, are designed to have free			
is being made through weatherization to establish an air barr			
required to meet the ventilation requirements outlined in AS	HRAE 62.2 – 2016, except	in any room that may be enclosed and	
contain a source of water or combustion.			
	esting/Inspection		
	ve Guidance 🛚	Results in Deferral/Referral	
DOE WAP H&S Funds ☑		Alternative Funds □	
ASHRAE 62.2 evaluation to determine required post-w			
Measure fan flow of existing fans and of installed equi	, ,	nce.	
	esting/Inspection		
Allowed with DOE WAP H&S Funds ☑		ed with Alternative Funds	
All homes will be assessed to determine if mechanical cooling			
both are present, the home must be deferred. If neither or on			
may continue. All homes must also be assessed for attached g			
high polluting sources, mold and moisture concerns, or the presence of unacceptable air through sensory moisture inspection.			
Where attached garages are present, they must be sealed to separate air flow from the interior of the home. Where clothes			
dryers are present, they must be properly vented to the outdoors. Refer to ASHRAE 62.2 – 2016 standard for full implementation			
requirements. Also see Combustion Gases and Mold and Mois	ture sections above.		
Consequent with a condition of the condition which conditions are administrative and conditions are as a condition of the conditions are as a condition of the conditions are as a condition of the conditions are a conditional are a conditions are a conditions are a conditional are a conditiona	la a makada a al la cekha a a a a a a		
Excess materials used in meeting this ventilation standard will		y. Items requiring removal from the nome	
will be properly disposed by WAP crews and must not be left with the client.  Required Occupant Education			
Concur with DOE Guidance ☑		lternative Guidance □	
Client will be provided with information on location of service			
ventilation system and components where present or installe	_		
installed equipment. Include disclaimer that ASHRAE 62.2 – 2			
air quality.	TTO GOES HOL ACCOUNT TO	mgn ponuting sources of guarantee moor	
an quanty.			

### 6.18 – Water Heaters (see Combustion Appliances for combustion related requirements) **Allowable Actions** Allowed with DOE WAP H&S Funds ☑ Allowed with Alternative Funds □ Replacement of water heaters for health and safety is allowed on a case-by-case basis. Replacement of water heaters with solar or hybrid heat pump water heaters will first be attempted through the priority list. Replacement and installation of other not related appliances are not allowed. Hot water tanks that are leaking water, producing high carbon monoxide, or drafting poorly will be assessed for repair or replacement. Combustion safety testing will be performed on all gas-fired water tanks. If repair is not possible, hot water tank can be replaced. All plumbing work is performed by license contractors and must comply with local codes. Local agency staff will confirm installation and that unit is working properly. Water heater repair/replacement will be performed by a licensed plumber. WAP auditor/assessor will be trained to determine if installation is adequate (hooked up, producing hot water, etc.). Disposal of appliances shall be according to the environmental standards in the Clean Air Act 1990, Section 608, as implemented by 40 CFR 82 (7/1/2006). Disposal shall be by contractor/vendor. Disposed units will be recycled when possible. **Required Testing/Inspection** Concur with DOE Guidance ✓ Alternative Guidance Results in Deferral/Referral □ DOE WAP H&S Funds ☑ Alternative Funds □ Visual inspection of all water heaters and related piping for safety and leaks See Combustion Appliances section for related combustion safety testing requirements. Allowable Testing/Inspection Allowed with DOE WAP H&S Funds ☑ Allowed with Alternative Funds □ If serious electrical hazards, gross overloads, or electrical wiring exposure are present, the energy auditor shall notify the owner and document in the client's file. If such condition is present, the client's home shall be deferred to resolve such major problems prior to any weatherization work. **Required Occupant Education** Concur with DOE Guidance ☑ Alternative Guidance □ Appropriate use and maintenance of units. Provide all paperwork and manuals for any installed equipment. Where combustion equipment is present, provide combustion safety and hazards information including how to recognize depressurization, dangers of CO poisoning, and fire risks associated with combustion appliance use.

6.19 – Worker Safety			
Required Actions			
Concur with DOE Guidance   ✓	Alternative Guidance □		Results in Deferral/Referral
DOE WAP H&S Funds ☑		Alternative Funds □	
Adherence to all federal, state, and local worker safety regulations (e.g., OSHA, EPA).			
Allowable Actions			
Allowed with DOE WAP H&S F	unds 🗹	Allowed with Alternative Funds □	

Since Hawaii's Weatherization Assistance Program mainly installs baseloads, subgrantees' auditors/assessors perform initial assessment, install baseloads, and perform final inspections. Installation of solar hot water systems and hybrid heat pump water heaters will be done by contractors. Room air conditioners and refrigerators are delivered and installed by vendors. Old units are disposed of by vendors per EPA guidelines. Workers must follow OSHA standards where required and take precautions to ensure the H&S of themselves and other workers. OSHA Confined Space requirements will be followed as applicable.

Equipment purchases to protect the health and safety of the worker (e.g., Personal Protective Equipment (PPE), jobsite cleaning supplies).

supplies).			
Prohibited Actions			
Concur with DOE Guidance   ✓			
Using DOE funds for major repairs as defined by Hawaii's H&S Plan.			
Define "major" repairs			
"Major" repairs are defined as any repair exceeding the projected average cost per unit during the given program year.			
Allowable Testing			
Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds $\square$		
Environmental and surveillance testing required by OSHA regulation.			

6.X – (Insert Additional H&S Items for Use of DOE WAP H&S funds)			
Required Actions			
Concur with DOE Guidance	Alternative (	Guidance □	Results in Deferral/Referral □
DOE WAP H&S Funds D	]		Alternative Funds □
Insert required item text			
	Allowabl	e Actions	
Allowed with DOE WAP H&S Funds □		Allowed with Alternative Funds □	
If DOE WAP H&S Funds are used for any "allowable" actions, detail them here.			ons, detail them here.
Prohibited Actions			
Concur with DOE Guidance			
What is prohibited			
	Required Testi	ng/Inspection	
Concur with DOE Guidance	Alternative (	Guidance □	Results in Deferral/Referral □
DOE WAP H&S Funds [	nds  Alternative Funds		Alternative Funds □
Insert required item text			
Allowable Testing/Inspection			
Allowed with DOE WAP H&S Funds □		Allowed with Alternative Funds □	
If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.			
Prohibited Testing/Inspection			
Concur with DOE Guidance			
What is prohibited			
Required Occupant Education			
Concur with DOE Guidance	Concur with DOE Guidance □ Alternative Guidance □		
	Insert re	quired item text	